REMARKS

This Application has been carefully reviewed in light of the Advisory Action mailed May 19, 2005. Applicant respectfully requests reconsideration and favorable action in this Application.

Claims 1, 9-11, 19, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Smith, et al. in view of Tari, et al. and further in view of Wang. Independent Claims 1, 19, and 20 recite in general the ability to allocate particular client NAT addresses of a client NAT address range to a subpool and ensure that the particular client NAT addresses in the client NAT address range remain allocated within the subpool until all of the particular addresses within the client NAT address range of the subpool have been freed. By contrast, the Smith, et al. patent is directed to allocating storage locations in a flash memory and not client NAT addresses associated with an identity of an entity on a network as provided by the claimed invention. The Tari, et al. patent is directed to assigning an Internet IP address to a client and converting the assigned Internet IP address, when sending data thereto, to a local IP address of the client. There is no similarity of subject matter between the Smith, et al. patent and the Tari, et al. patent. In addition, the Wang patent is directed to mapping a range of storage associated with a virtual memory to pages of physical memory. Thus, the Wang patent has no commonality with client NAT addresses and their allocation as provided by the claimed invention. As a result, there could be no proper combination of the Smith, et al., Tari, et al., and Wang patents according to any objective reasoning.

Further, the structure that would result from placing the IP address conversion technique of the Tari, et al. patent with the storage mapping technique of the Wang patent into the

flash memory storage allocation technique of the Smith, et al. patent would still lack the ability to allocate particular client NAT addresses of a client NAT address range to a subpool and ensure that the particular client NAT addresses in the client NAT address range remain allocated within the subpool until all of the particular addresses within the client NAT address range of the subpool have been freed as provided by the claimed invention. Therefore, Applicant respectfully submits that Claims 1, 9-11, 19, and 20 are patentably distinct from the proposed Smith, et al. - Tari, et al. - Wang combination.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending claims.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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December 9, 2005

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